

ORIGINAL

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

MAGISTRATE JUDGE BOWLER

UNITED STATES OF AMERICA)

v.)

MATTHEW VICKERS)

CRIMINAL NO. **04-10027-PBS**
VIOLATIONS:
21 U.S.C. § 841(a)(1) -
Possession of a Controlled
Substance With Intent to
Distribute

INDICTMENT

COUNT ONE: (21 U.S.C. § 841(a)(1) - Possession with Intent
to Distribute Cocaine)

The Grand Jury charges that:

On or about May 14, 2001, at Boston, in the District of
Massachusetts,

MATTHEW VICKERS,

the defendant herein, did knowingly and intentionally possess
with intent to distribute cocaine, a Schedule II controlled
substance.

All in violation of Title 21, United States Code, Section
841(a)(1).

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COUNT TWO: (21 U.S.C. § 841(a)(1) - Possession with Intent
 to Distribute Cocaine Base)

The Grand Jury further charges that:

On or about October 19, 2003, at Boston, in the District of
Massachusetts,

MATTHEW VICKERS,

the defendant herein, did knowingly and intentionally possess
with intent to distribute more than five grams of cocaine base, a
Schedule II controlled substance.

All in violation of Title 21, United States Code, Section
841(a)(1).

COUNT THREE: (Title 21, United States Code, Section 851 --
Notice of Prior Conviction)

The United States Attorney charges that:


1. On or about January 7, 1999, **MATTHEW VICKERS** was convicted in the Dorchester District Court in Dorchester, Massachusetts for distribution of a Class B controlled substance (to wit: cocaine) in violation of Mass. Gen. L. c. 94C, §32E.


2. **MATTHEW VICKERS** has been named as a defendant in the within Indictment, which charges **MATTHEW VICKERS**, inter alia, with one count of possession with intent to distribute more than five grams of cocaine base, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1).

3. By way of this information, the government notifies **MATTHEW VICKERS** that he is charged with committing the said crime after having been previously convicted of the felony drug offense as set out in paragraph 1 above.

All in keeping with Title 21, United States Code, Section 851(a)(1).

A TRUE BILL


FOREPERSON OF THE GRAND JURY


ROBERT E. RICHARDSON
ASSISTANT U.S. ATTORNEY

DISTRICT OF MASSACHUSETTS; *Feb 4*, 2004

Returned into the District Court by Grand Jurors and filed.


DEPUTY CLERK

3:07P.